

Georgia Department of Natural Resources

Environmental Protection Division • Air Protection Branch

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Mark Williams, Commissioner

F. Allen Barnes, Director

NARRATIVE

TO: Furqan Shaikh

FROM: Anna C. Aponte 

DATE: November 15, 2011

Facility Name: **Plant Washington**

AIRS No.: 30300051

Location: Sandersville, GA (Washington County)

Application #: 20397

Date of Application: April 18, 2011

Background Information

Draft Permit No. 4911-303-0051-P-01-1 was issued on July 21, 2011. A public hearing was held on August 18, 2011 with the comment period ending on August 29, 2011. EPD received comments from GreenLaw on August 29, 2011, and hundreds of letters and emails from public citizens. The comments are listed below along with the Division's responses and a discussion of any changes made to the final Permit.

Response to Comments

GreenLaw Comments

Please refer to EPD's permit file for the entire copy of the comments received (24 pages and attachments) from Southern Environmental Law Center and GreenLaw.

Comment 1:

I. EPA's Proposed MACT Standards for Coal-Fired Power Plants

EPD's Response: EPD agrees that Plant Washington will be a new source under the currently proposed EGU MACT standard. When the final rule for Utility EGU MACT (40 CFR 63 Subpart UUUUU) is promulgated and becomes effective, Plant Washington will have to comply with all the emission limitations and requirements in the final rule in accordance with provisions of 40 CFR 63 Subpart B. Until then, Plant Washington is subject to the case-by-case MACT determination.

II. The Draft NOMA and Amended Air Quality Permit Improperly Rely on Surrogates for Control of Non-Mercury Metal HAPs, Acid Gas HAPs, and Organic HAPs.

A. Particulate Matter is Not an Appropriate Surrogate for Non-Mercury Metal HAPs.

EPD's Response: This comment does not address an issue that is within the scope of the Permit Amendment, i.e., the use of PM filterable as a surrogate for non-mercury metal HAPs was part of the original Permit and not was changed by this Permit Amendment. A complete discussion on the use of PM as a surrogate is contained in the Notice of MACT Approval dated August 2009 and the Final Determination dated April 2010.

EPD has already addressed the appropriateness of PM as a surrogate for Selenium. Please refer to P4G's response to GreenLaw comments on the original PSD permit dated March 2010 and the Final Determination dated April 2010.

EPA's proposed EGU MACT allows the use of PM as a surrogate for non-mercury metals. EPD concurs with EPA for the reasons stated in the Notices of MACT Approval dated August 2009 and June 2011.

B. Sulfur Dioxide is Not an Appropriate Surrogate for Acid Gas HAPs.

EPD's Response: This comment does not address an issue that is within the scope of the Permit Amendment, which relates only to the MACT determinations for non-mercury metal HAPs and organic HAPs.

C. Carbon Monoxide Is Not an Appropriate Surrogate for Organic HAPs.

EPD's Response: EPA's proposed EGU MACT allows the use of a work practice standard (good combustion practices) for organic HAPs. CO has historically been used as an indicator of complete combustion. This is because under ideal circumstances, a carbon-based fuel will completely oxidize to produce carbon dioxide and water. For incomplete combustion, CO is formed in addition to carbon dioxide and water. CO and Organic HAPs are the product of incomplete combustion. At a first glance it would seem reasonable to assume that limiting CO would also limit the formation of Organic HAPs. However, as EPA has stated in the draft Utility MACT preamble, "it is very difficult to develop direct correlations between the average concentration of CO and the amount of organics produced during the prescribed sampling period in the MPCRf (which was 4 hours for the pilot-scale test described here)." The above reasons are why EPD did not designate CO as a surrogate for Organic HAPs.

EPD agrees with EPA that work practice standards are sufficient and appropriate for the control of organic HAPs. This determination was made after extensive ICR testing indicated that organic HAPs are being emitted in very low concentrations and a testing protocol would be overly burdensome. The following is from page 25027 of the proposed EGU MACT:

Pursuant to CAA section 112(h), we are proposing a work practice standard for organic HAP, including emissions of dioxins and furans, from all subcategories of EGU. The work practice standard being proposed for these EGUs would require the implementation of an annual performance (compliance) test program as described elsewhere in this preamble. We are proposing work practice standards because the data confirm that the significant majority of the measured organic HAP emissions from EGUs are below the detection levels of the EPA test methods, and, as such, EPA considers it impracticable to reliably measure emissions from these units. As discussed later in this preamble, EPA believes the inaccuracy of a majority of measurements coupled with the extended sampling times used, fulfill the criteria for these HAP to be subject to a work practice standard under CAA section 112(h).

D. The Draft NOMA and Amended Permit Should Set MACT Limits Directly for Dioxins and Furans.

EPD's Response: This comment does not address an issue that is within the scope of the Permit Amendment, which relates only to MACT determinations for non-mercury metal HAPs and organic HAPs

EPD notes that, Judge Walker at the office of State Administration Hearing (OSAH) made the following statement in the Final Decision dated December 16, 2010: "Irrespective of where or how dioxins and furans are formed, the evidence in the record establishes a correlation between the removal of CO and the limitation of dioxins and furans."

The draft Utility EGU MACT (40 CFR 63 Subpart UUUUU) does not contain limits for dioxins and furans.

III. The Draft NOMA and Amended Air Quality Permit Do Not Meet MACT-Floor Emission Standards for Non-Mercury Metal Hazardous Air Pollutants.

EPD identified four major points that need to be addressed. For the complete comment, please refer to the GreenLaw letter dated August 29, 2011.

First, GreenLaw stated "EPD may not fulfill its obligation to conduct a thorough, case-by-case MACT determination for Plant Washington simply by deferring to EPA's proposed rule."

EPD's Response: After Plant Washington submitted their new application which used the newly proposed EGU MACT to guide them in their proposal, EPD reviewed the available information. EPD requested that Plant Washington submit the ICR data that they were referencing so that EPD could verify the information provided in the application. After a thorough review of the available testing data, proposed EGU MACT, Plant Washington's application and supporting documentation, EPD determined what the new MACT limit would be for non-mercury metal HAPs. EPD reviewed the analysis, determination and methods for compliance proposed by EPA in the proposed EGU MACT and included the portions that EPD believes to be applicable to the facility for non-mercury metal HAPs.

Judge Walker's December 16, 2010 decision points to EPD relying solely on emissions limits from existing sources and not considering stack test data as to what level of control can be *achieved in practice*. By contrast, US EPA, in preparation for the EGU MACT, gathered information from hundreds of stack tests conducted on dozens of utilities. This extensive data provides evidence of emission levels that are *achieved in practice* (at least during the period of operation during the test). The limits in the proposed EGU MACT reflect the conclusions of US EPA, which is the author of both the federal case-by-case MACT regulations (40 CFR 63 Subpart B) developed in accordance with 112(g) of the Clean Air Act and the proposed EGU MACT, developed in accordance with 112(d) of the Clean Air Act.

Second, GreenLaw stated, "EPD did not conduct a beyond-the-floor MACT analysis specific to Plant Washington, again simply deferring to P4G's discussion of EPA's proposed Power Plant MACT Rule."

EPD's Response: EPD did conduct a beyond-the-floor MACT analysis for Plant Washington. EPD determined that the proposed EGU MACT was sufficient in limiting non-mercury metal HAPs. EPD is required to strongly consider a proposed MACT Standard; EPD reviewed the proposed MACT and agreed with EPA's determination. In addition, EPD reviewed the available ICR data from similar

plants. EPD reviewed, and concurred with, EPA's analysis and conclusions regarding beyond the floor. The following is from page 25048 of the proposed EGU MACT:

The MACT floor level of control for new EGUs is based on the emission control that is achieved in practice by the best controlled similar source within each of the subcategories. No technologies were identified that would achieve HAP reduction greater than the new source floors for the subcategories, except for multiple controls in series (e.g., multiple FFs) which we consider to be unreasonable from a cost perspective.

The limits in the proposed EGU MACT reflect the conclusions of US EPA, which is the author of both the federal case-by-case MACT regulations (40 CFR 63 Subpart B) developed in accordance with 112(g) of the Clean Air Act and the proposed EGU MACT, developed in accordance with 112(d) of the Clean Air Act.

Third, GreenLaw stated "EPD's acceptance of P4G's rationale for rejecting fuel-switching to natural gas as a beyond-the-floor control option for Plant Washington confirms that EPD did not require or conduct a case-by-case analysis specific to Plant Washington."

EPD's Response: EPD has long considered such radical changes as switching from coal to natural gas to be redefining the project. EPD used the information provided by Plant Washington, the proposed EGU MACT and the additional information in the docket to conduct the review. The following is from page 25048-9 of the proposed EGU MACT:

Fuel switching to natural gas is a potential regulatory option beyond the new source floor level of control that would reduce HAP emissions. However, natural gas supplies are not available in some areas. Thus, this potential control option may be unavailable to many sources in practice. Limited emissions reductions in combination with the high cost of fuel switching and considerations about the availability and technical feasibility of fuel switching makes this an unreasonable regulatory option that was not considered further. As discussed above, the uncertainties associated with nonair quality health and environmental impacts also argue against determining that fuel switching is reasonable beyond-the-floor option. In addition, even if we determined that natural gas supplies were available in all regions, we would still not adopt this fuel switching option because it would effectively prohibit new construction of coal-fired EGUs and we do not think that is a reasonable approach to regulating HAP emissions from EGUs.

Fourth, GreenLaw stated "the Draft NOMA lacks adequate assurances that compliance with the filterable PM limit (which is already flawed because it is not sufficiently stringent) will demonstrate adequate control of the various HAP metals Plant Washington will emit." Specifically, the baghouse leak detection system and fuel sampling are to be used as a measure of compliance.

EPD's Response: EPD determined that the PM CEMS is the compliance method and adding a baghouse leak detection system was an additional requirement that would not give any additional or increased level of assurance that the facility would be in compliance. Plant Washington is using the PM CEMS as the compliance determination method. A facility cannot use a baghouse leak detection system to determine if they are in compliance with a specified PM emission limit because it will not provide data in units of the emission standard. The system can be used to show that the baghouse is operating properly, but the PM CEMS will do the same thing and the PM CEMS has the added benefit of measuring the emissions in units of the (filterable) standard. EPD believes the use of a baghouse leak detection system is duplicative and does not provide an increased level of confidence for determining compliance with the PM emission limit.

Plant Washington proposed using the PM surrogate emission limit for the non-mercury metal HAPs. The issue of PM as a surrogate for non-mercury metal HAPs has already been addressed in Comment II.A. The addition of fuel sampling does not add any additional level of assurance that the facility would be in compliance. The facility will be equipped with a PM CEMs that will measure the filterable PM on a continuous basis. Measuring the metals content of the coal does not provide a direct correlation to the amount of PM at the smoke stack. EPD believes the use of fuel sampling is duplicative and does not provide an increased level of confidence for determining compliance with the PM emission limit.

IV. The Draft NOMA and Amended Air Quality Permit Do Not Meet MACT-Floor Emission Standards for Organic Hazardous Air Pollutants.

EPD identified four major points that need to be addressed. For the complete comment, please refer to the GreenLaw letter dated August 29, 2011.

First, GreenLaw stated "EPD may not fulfill its obligation to conduct a thorough, case-by-case MACT determination for Plant Washington simply by deferring to EPA's proposed rule."

EPD's Response: After Plant Washington submitted their new application which used the newly proposed EGU MACT to guide them in their proposal, EPD reviewed the available information. After a thorough review of the available testing data, proposed EGU MACT, Plant Washington's application and supporting documentation, EPD determined what the new MACT requirement would be for organic HAPs. EPD reviewed, and concurred with, the analysis, determination and methods for compliance proposed by EPA in the proposed EGU MACT.

Judge Walker's December 16, 2010 decision points to EPD relying solely on emissions limits from existing sources and not considering stack test data as to what level of control can be *achieved in practice*. By contrast, US EPA, in preparation for the EGU MACT, gathered information from hundreds of stack tests conducted on dozens of utilities. This extensive data provides evidence of emission levels that *achieved in practice* (at least during the period of operation during the test). The limits in the proposed EGU MACT reflect the conclusions of US EPA, which is the author of both the federal case-by-case MACT regulations (40 CFR 63 Subpart B) developed in accordance with 112(g) of the Clean Air Act and the proposed EGU MACT, developed in accordance with 112(d) of the Clean Air Act.

EPD agrees with EPA that work practice standards are sufficient and appropriate for the control of organic HAPs. This determination was made after extensive ICR testing indicated that organic HAPs are being emitted in very low concentrations and a testing protocol would be over burdensome. The following is from page 25027 of the proposed EGU MACT:

Pursuant to CAA section 112(h), we are proposing a work practice standard for organic HAP, including emissions of dioxins and furans, from all subcategories of EGU. The work practice standard being proposed for these EGUs would require the implementation of an annual performance (compliance) test program as described elsewhere in this preamble. We are proposing work practice standards because the data confirm that the significant majority of the measured organic HAP emissions from EGUs are below the detection levels of the EPA test methods, and, as such, EPA considers it impracticable to reliably measure emissions from these units. As discussed later in this preamble, EPA believes the inaccuracy of a majority of measurements coupled with the extended sampling times used, fulfill the criteria for these HAP to be subject to a work practice standard under CAA section 112(h).

In addition, EPA discusses the lack of test data due to a significant majority of the organic HAP emissions were below the detection levels. The following is from page 25040 of the proposed EGU MACT:

EPA is proposing work practice standards for non-dioxin/furan organic and dioxin/furan organic HAP. The significant majority of measured emissions from EGUs of these HAP were below the detection levels of the EPA test methods, and, as such, EPA considers it impracticable to reliably measure emissions from these units. As the majority of measurements are so low, doubt is cast on the true levels of emissions that were measured during the tests. Overall, 1,552 out of 2,334, total test runs for dioxin/furan organic HAP contained data below the detection level for one or more congeners, or 67 percent of the entire data set. In several cases, all of the data for a given run were below the detection level; in few cases were the data for a given run all above the detection level. For the nondioxin/furan organic HAP, for the individual HAP or constituent, between 57 and 89 percent of the run data were comprised of values below the detection level. Overall, the available test methods are technically challenged, to the point of providing results that are questionable for all of the organic HAP. For example, for the 2010 ICR testing, EPA extended the sampling time to 8 hours in an attempt to obtain data above the MDL. However, even with this extended sampling time, such data were not obtained making it questionable that any amount of effort, and, thus, expense, would make the tests viable. Based on the difficulties with accurate measurements at the levels of organic HAP encountered from EGUs and the economics associated with units trying to apply measurement methodology to test for compliance with numerical limits, we are proposing a work practice standard under CAA section 112(h).

We do not believe that this approach is inconsistent with that taken on other NESHAP where we also had issues with data at or below the MDL (e.g., Portland Cement NESHAP; Boiler NESHAP). In the case of the Portland Cement NESHAP, the MDL issue was with HCl (a single compound HAP as opposed to the oftentimes multi-congener organic HAP), and in data from only 3 of 21 facilities. As noted elsewhere in this preamble, we dealt with similar MDL issues with HCl in establishing the limits in this proposed rule. In the case of the Boiler NESHAP, the MDL issue was with the organic HAP. For that rulemaking, the required sampling time during conducting of the associated ICR was 4 hours, as opposed to the 8 hours required in the 2010 ICR. Further, a review of the data indicates that the dioxin/furan HAP levels (a component of the organic HAP) were at least 7 times greater, on average, for coal-fired IB units and 3 times greater, on average, for oil-fired IB units than from similar EGUs. We think this difference is significant from a testing feasibility perspective.

Second, GreenLaw stated, "P4G's analysis is fundamentally flawed with respect to CO as a surrogate for dioxin and furans."

EPD's Response: This comment does not address an issue that is within the scope of the Permit Amendment, which relates only to MACT determinations for non-mercury metal HAPs and organic HAPs

Note that Judge Walker made the following statement in the Final Decision dated December 16, 2010: "Irrespective of where or how dioxins and furans are formed, the evidence in the record establishes a correlation between the removal of CO and the limitation of dioxins and furans."

Third, GreenLaw stated, "even for those organic HAPs formed and controlled in the boiler only, tracking CO emissions with CEMS is not an appropriate method for meeting MACT emissions requirements for organic HAPs."

EPD's Response: CO CEMS are not the compliance method for organic HAPs. The use of work practice standards to minimize the formation of organic HAPs is the designated method of compliance as determined in the Notice of MACT Approval. Permit Condition 7.27 explicitly lists the requirements for a boiler tune up to ensure the most optimal operation of the boiler system is achieved. EPD used the proposed EGU MACT language to be consistent with what EPA is currently recommending for the work practice standard compliance requirements. The use of work practice standards for the purpose of ensuring complete combustion in order to minimize the formation of certain pollutants is routinely used by EPA and has been included in the proposed EGU MACT.

Fourth, GreenLaw stated, "the Draft NOMA and Amended Permit impermissibly prioritize control of nitrogen oxide ("NOx") emission at the expense of optimal control CO as a surrogate for organic HAPs."

EPD's Response: CO is not a surrogate for organic HAPs as was stated in the Notice of MACT Approval on page 16 in EPD's review. However, regarding CO & organic HAPs, EPA addresses this on page 25039 in the proposed EGU MACT.

With complex carbon-based fuels, combustion is rarely ideal and some CO and concomitant organic compounds are expected to be formed. Because CO and organics are both products of poor combustion, it is logical to expect that limiting the concentration of CO would also limit the production of organics. However, it is very difficult to develop direct correlations between the average concentration of CO and the amount of organics produced during the prescribed sampling period in the MPCRF (which was 4 hours for the pilot-scale tests described here). This is especially true for low values of CO as one would expect corresponding low quantities of organics to be produced. Samples of coal combustion flue gas have mostly shown very low quantities of the organic compounds of interest. Some of the flue gas organics may also be destroyed in the high temperature post combustion zone (whereas the CO would remain stable). Semi-volatile organics may also condense on PM and be removed in the PM control device.

CO is an indicator of complete combustion but is not a surrogate for organic HAPs. Therefore the CO BACT limit remains, but the MACT limit for organic HAPs is a work practice standard like EPA has included in the proposed EGU MACT. This conclusion was reached independent from the NOx BACT conclusion. This decision on MACT for organic HAPs did not prioritize NOx emissions. The stringency of the NOx BACT limit does not affect the work practice requirements.

V. The Draft NOMA and Amended Air Quality Permit Do Not Meet MACT-Floor Emission Standards for Mercury and Acid Gas Hazardous Air Pollutants.

EPD's Response: This comment does not address an issue that is within the scope of the Permit Amendment, which relates only to MACT determinations for non-mercury metal HAPs and organic HAPs.

Attachment 1 – Sierra Club's comments to EPA on draft EGU MACT

EPD's Response: None of the comments in Attachment 1 address issues specific to the draft Permit Amendment for Plant Washington. Therefore, EPD is not responding to the specifics in this document but it will be retained in the permit file.

EPD Response to Public Hearing Comments

A Public Hearing on Plant Washington permit amendment was held in Sandersville, Georgia on August 18, 2011. EPD received comments from citizens during the Public Hearing and in written format. Please refer to EPD's permit file for the entire copy of the comments. These comments and EPD's responses to the comments are summarized as follows:

Comment 1: Mercury and HCl were not updated based on the new proposed EGU MACT

EPD Response: Please refer to EPD's Response on GreenLaw comment V for additional discussion on this topic.

Comment 2: Permit should mirror new proposed EGU MACT

EPD Response: Until the final MACT Standard is promulgated, Plant Washington is subject to the case-by-case MACT determination. EPD is following the instructions for the remanded permit. EPD is required to reevaluate the MACT determinations for non-mercury metal HAPs and organic HAPs.

Comment 3: Concerns that the toxic emissions from the plant will harm food supply and water

EPD Response: EPD understands that citizens have many concerns about the overall environmental impact of this plant, and of coal burning in general. However, the scope of this air quality permit review is technology based is not intended to address these issues.

Comment 4: Permit does not address green house gases

EPD Response: This comment does not address an issue that is within the scope of the permit amendment, which relates only to MACT determinations for non-mercury metal HAPs and organic HAPs. Currently, since Plant Washington was issued a PSD permit prior to January 2, 2011, it is not subject to BACT for green house gases (GHG) in accordance with GHG Tailoring rule.

Comment 5: It's EPD's job to protect the environment and health while being proactive in doing this. Issuing this permit does not fulfilling EPD's job.

EPD Response: EPD's job is to enforce the rules and regulations that are applicable to the proposed facility.

The Georgia Rules for Air Quality Control and the Federal Rules for New Source Performance Standards (NSPS) and National Emission Standards for Hazardous Air Pollutants (NESHAPs) are designed to protect the environment and human health. EPD and the facility are required to complete modeling to anticipate and/or predict the ambient air quality impacts associated with the construction and operation of the proposed modification. The main purpose of the air quality analysis is to demonstrate that emissions emitted from the proposed new major stationary source, in conjunction with other applicable emissions from existing sources (including secondary emissions from growth associated with the new project), will not cause or contribute to a violation of any applicable National Ambient Air Quality Standard (NAAQS) or PSD increment in a Class II or Class I area. NAAQS exist for NO₂, CO, PM₁₀, PM_{2.5}, SO₂, Ozone (O₃), and lead (Pb). PSD increments exist for SO₂, NO₂, and PM₁₀.

There are no applicable NAAQS or specific Georgia ambient air standards for the non-criteria pollutants being emitted, such as HAPs. Impacts from each of the pollutants listed in this letter were analyzed using the EPD Guidance for Ambient Impact Assessment of Toxic Air Pollutant Emissions (referred to as the Georgia Air Toxics Guideline; Version June 21, 1998). The Georgia Air Toxics Guideline is a guide for estimating the environmental impact of sources of toxic air pollutants. A toxic air pollutant is defined as any substance, which may have an adverse effect on public health, excluding any specific substance that is covered by a State or Federal ambient air quality standard.

The Georgia Air Quality Act and the Georgia Rules in 391-3-1-.03(1)(c) state that the permit for the construction or modification of any facility shall be issued upon a determination by the Director that the facility can reasonably be expected to comply with all the provisions of the Act and the rules and regulations promulgated thereunder. Therefore, Georgia EPD must issue an air quality permit for Plant Washington if it is determined that they can reasonably be expected to comply with all applicable requirements in the rules and regulations.

Comment 6: Science says coal is old science and we should be going to more advanced technologies.

EPD Response: Plant Washington is planning on using the most up-to-date technologies for the facility that they have designed. EPD's job is to ensure that the facility is in compliance with all of the applicable rules and regulations.

Comment 7: Georgia should be looking at renewable energy. Permit is showing that Georgia is behind the times.

EPD Response: Comment so noted.

Comment 8: Permit does not require maximum control of mercury or hydrochloric acid.

EPD Response: Please refer to EPD's Response on GreenLaw comment V for additional discussion on this topic.

Comment 9: There is no such thing as clean coal.

EPD Response: Comment so noted.

Comment 10: What cost can you put on human health? Coal is the worst possible solution.

EPD Response: Please refer to EPD's Response on comment 5 for additional discussion on this topic.

Comment 11: Why is EPD allowing this when there are more stringent standards? There are better alternatives. Why is it being built when the power is not needed?

EPD Response: Please refer to EPD's Response on comment 5 for additional discussion on this topic.

Modified or New Permit Conditions

- 2.39 The Permittee shall establish an operating PM filterable limit (in units of mg/dscm concentration basis, 30-day average) **from Coal Fired Boiler S1**, for demonstrating ongoing compliance with the emissions limits for non-mercury metal HAPs during performance testing for initial PM compliance. The operating limit shall be the highest of the PM filterable monitoring results from the PM CEMS (mg/dscm concentration basis) during the performance test (that demonstrate compliance with Condition 2.13.s) required by Condition 6.3.i. The Permittee shall reestablish this operating limit based on subsequent testing required once every 5 years per Condition 6.3.j.
[40 CFR 63 Subpart B]
- 7.27 The facility shall implement a work practice standard for organic HAP emissions to be conducted annually **from Coal Fired Boiler S1**, unless otherwise specified, as follows:
[40 CFR 63 Subpart B]
- a. Inspect the burners, and clean or replace any components of the burner as necessary (burner inspection can be delayed until the next scheduled unit shutdown, but each burner shall be inspected at least once every 18 months).
 - b. Inspect the flame pattern, as applicable, and make any adjustments to the burner necessary to optimize the flame pattern. The adjustment shall be consistent with the manufacturer's specifications.
 - c. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly.
 - d. Optimize total emissions of CO and NOx. This optimization shall be consistent with the manufacturer's specifications and the emission limits established in 2.13.
 - e. Measure the concentration in the effluent stream of CO and NOx in ppm, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made).
 - f. Maintain on-site and submit, if requested by the EPD, an annual report containing the information as follows;
 1. The concentrations of CO and NOx in the effluent stream in ppm by volume, and oxygen in volume percent, measured before and after the adjustments of the main boiler.
 2. A description of any corrective actions taken as a part of the combustion adjustment.
 3. The type and amount of fuel used over the 12 months prior to an adjustment, but only if the unit was physically and legally capable of using more than one type of fuel during that period.

Summary & Recommendations

In summary, it is recommended that Air Quality Permit No. 4911-303-0051-P-01-1 be issued for the Plant Washington facility. This facility is classified as an A source with SSCP responsible for inspections and complaints.